

Message Text

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PAGE 01 STATE 193927
ORIGIN TRSE-00

INFO OCT-01 EUR-12 ISO-00 FS-01 L-03 /017 R

TX-387

DRAFTED BY TREASURY:XLI:HDROSENBLOOM:HC
APPROVED BY STATE:L/T AROVINE
EUR/WE:MCRAMERUS
-----037638 012248Z /64
P 012125Z AUG 78
FM SECSTATE WASHDC
TO AMEMBASSY PARIS PRIORITY

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E.O. 11652:N/A

TAGS:EFIN

SUBJECT: TRANSMITTAL OF LETTER

FOR: FRANK BARNDT, IRS

1. PLEASE TRANSMIT THE FOLLOWING LETTER AND ENCLOSURE
THERE TO TO JEAN-LOUIS DONNADIEU, ADMINISTRATEUR CIVIL,
MINISTERE DE L'ECONOMIE ET DES FINANCES AS SOON AS POSSIBLE.
IF DONNADIEU IS ABSENT, TRANSMIT TO MR. RONCHAUD.

DEAR JEAN-LOUIS:

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THE INTERNAL REVENUE SERVICE IS STILL CONSIDERING WHETHER
THE BANQUE FRANCAISE DE COMMERCE EXTERIEUR QUALIFIES FOR
EXEMPTION UNDER PARAGRAPH 8 OF ARTICLE 10 OF OUR PRESENT
INCOME TAX CONVENTION. I PROMISED PIERRE THAT I WOULD BE
IN TOUCH WITH YOU BEFORE THE END OF THE MONTH WITH FURTHER
NEWS. UNFORTUNATELY, I AM NOT YET IN A POSITION TO GIVE A
DEFINITIVE RESPONSE.

IN THE CIRCUMSTANCES I SUGGEST THAT WE AGREE UPON A PRO-

POSED TEXT OF AN INSERTION IN THE PROTOCOL THAT WE ARE PRESENTLY ABOUT TO SIGN. THIS INSERTION WOULD REQUIRE A NEW POINT 5 IN ARTICLE I AND WOULD FURTHER REQUIRE RENUMBERING POINTS 5, 6, 7, 8, AND 9, AS 6, 7, 8, 9, AND 10. IF YOU AGREE WITH THE ENCLOSED TEXT, I WOULD SUGGEST THAT IN ORDER TO SAVE TIME YOU REFER THIS TEXT IMMEDIATELY TO YOUR LANGUAGE SERVICES SO THAT TRANSLATION WILL NOT DELAY THE PROGRESS OF THE PROTOCOL. WE ARE HOPING TO HAVE THE PROTOCOL SIGNED SOMETIME IN THE MONTH OF AUGUST.

IF THE INTERNAL REVENUE SERVICE DECIDES THAT THE BANQUE IS COVERED UNDER THE PRESENT CONVENTION, WE CAN THEN DISCARD THE INSERTION.

IF YOU HAVE QUESTIONS OR PROBLEMS, PLEASE CALL ME.

BEST WISHES.

SINCERELY,

H. DAVID ROSENBLOOM
DIRECTOR
OFFICE OF INTERNATIONAL TAX AFFAIRS

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INSERTION IN PROTOCOL TO U.S.-FRANCE INCOME TAX CONVENTION

5. IN ARTICLE 10, PARAGRAPH (8) IS AMENDED BY ADDING THE FOLLOWING SENTENCE IMMEDIATELY AFTER THE FIRST SENTENCE:

"FOR PURPOSES OF THE PRECEDING SENTENCE THE EXPORT-IMPORT BANK OF THE UNITED STATES SHALL BE CONSIDERED AN INSTRUMENTALITY OF THE UNITED STATES AND THE BANQUE FRANCAISE DE COMMERCE EXTERIEUR, TO THE EXTENT THAT ITS ACTIVITIES ON BEHALF OF FRANCE ARE SIMILAR TO THOSE OF THE EXPORT-IMPORT BANK OF THE UNITED STATES AND ITS INCOME FROM SUCH ACTIVITIES IS EXEMPT IN FRANCE, SHALL BE CONSIDERED AN INSTRUMENTALITY OF FRANCE. VANCE

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Message Attributes

Automatic Decaptioning: X
Capture Date: 01 jan 1994
Channel Indicators: n/a
Current Classification: UNCLASSIFIED
Concepts: TEXT, PUBLIC CORRESPONDENCE, BANKS, TAX RELIEF, TAX AGREEMENTS
Control Number: n/a
Copy: SINGLE
Draft Date: 01 aug 1978
Decaption Date: 01 jan 1960
Decaption Note:
Disposition Action: RELEASED
Disposition Approved on Date:
Disposition Case Number: n/a
Disposition Comment: 25 YEAR REVIEW
Disposition Date: 20 Mar 2014
Disposition Event:
Disposition History: n/a
Disposition Reason:
Disposition Remarks:
Document Number: 1978STATE193927
Document Source: CORE
Document Unique ID: 00
Drafter: XLI:HDROSENBLOOM:HC
Enclosure: n/a
Executive Order: N/A
Errors: N/A
Expiration:
Film Number: D780315-0252
Format: TEL
From: STATE
Handling Restrictions: n/a
Image Path:
ISecure: 1
Legacy Key: link1978/newtext/t197808111/aaaadpcg.tel
Line Count: 106
Litigation Code IDs:
Litigation Codes:
Litigation History:
Locator: TEXT ON-LINE, ON MICROFILM
Message ID: 1a166b59-c288-dd11-92da-001cc4696bcc
Office: ORIGIN TRSE
Original Classification: LIMITED OFFICIAL USE
Original Handling Restrictions: n/a
Original Previous Classification: n/a
Original Previous Handling Restrictions: n/a
Page Count: 2
Previous Channel Indicators: n/a
Previous Classification: LIMITED OFFICIAL USE
Previous Handling Restrictions: n/a
Reference: n/a
Retention: 0
Review Action: RELEASED, APPROVED
Review Content Flags:
Review Date: 05 may 2005
Review Event:
Review Exemptions: n/a
Review Media Identifier:
Review Release Date: N/A
Review Release Event: n/a
Review Transfer Date:
Review Withdrawn Fields: n/a
SAS ID: 1573980
Secure: OPEN
Status: NATIVE
Subject: TRANSMITTAL OF LETTER FOR: FRANK BARNDT, IRS
TAGS: EFIN, US, FR, IRS-2, (DONNADIEU, JEAN-LOUIS), (ROSENBLOOM, H DAVID)
To: PARIS
Type: TE
vdkgvwkey: odb://SAS/SAS.dbo.SAS_Docs/1a166b59-c288-dd11-92da-001cc4696bcc
Review Markings:
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